FILED

IN THE UNITED STATES DISTRICT COURT NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

JUL 1 5 2008 april 5 2008 MICHAEL W. BOBBINS OLERK, U.S. DISTRICT COURT

RONALD D. GRANGER,

Plaintiff,

-Vs-

PARTHA GHOSH, et al.,

Defendants.

No. 08 CV39 Judge Robert M. Dow, Jr.

PLAINTIFF'S RESPONSE TO DR. PARTHA GHOSHS MOTION TO DISMISS

AND PLAINTIFF'S MOTION FOR EXTENTION OF TIME TO FILE THE AMENDED

COMPLAINT WHICH WILL NAME THE PROPER PARTY-DEFENDANT'S.

Plaintiff, Ronald D. Granger, Pro se, hereby files his response to Dr. Ghosh's Motion to Dismiss, and further, Plaintiff is requesting that this also be liberally construed as Plaintiff's Motion for an extention of time to file an "AMENDED COMPLAINT" naming proper party-Defendants. Plaintiff asserts the following.

- 1. Plaintiff concedes and agrees that <u>Dr. Partha Ghosh's</u>
 Motion to Dismiss should be granted as he is an improper party-Defendant in this instance for the wrongful acts that occurred against plaintiff.
- 2. Plaintiff has a limited education, Plaintiff has difficulty in preparing or drafting any legal pleading without assistance from various inmate's,
- 3. Up to todays date, Plaintiff has had no assistance from any person who has any knowledge of the process and requirements of pursuing relief under the Civil Rights Act (42 U.C.S. § 1983).
- 4. Plaintiff's Initial Complaint and an improperly prepared "AMENDED COMPLAINT" form that was recently inadvertantly mailed contain

virtually minimal "Facts" that are seriously "So Vague" that it will be very difficult for the Court or (anyone) to ascertain what occurred and who is responsible for the wrongful acts complained of.

- 5. Plaintiff is requesting the Court to "DISREGARD" the "AMENDED COMPLAINT" that has inadvertantly mailed only two-days ago as it contains insufficient facts and still does not name the proper parties.
- 6. Plaintiff has sought the assistance of a Paralegal to allege the "Facts" clearly and name the proper party-Defendants in an "AMENDED COMPLAINT". In which Plaintiff is requesting an Extention of time to file the Amended Complaint which will name the proper party-defendants.
- 7. Plaintiff believes that he has a just cause of action under the Civil Rights Act, and respectfully request this Honorable to grant Plaintiff up to (30)-days to file an "Amended Complaint" which names proper-Party Defendant's and state's sufficient "Facts" to state meritorious Claims for relief.

WHEREFORE, For these reasons stated above, Plaintiff respectfully Prays that this Honorable Court Grant Dr. Partha Ghosh's Motion to Dismiss, and Grant Plaintiff (30)-days to file an "Amended Complaint" that names proper Party-Defendants and further It is respectfully prayed that the Court "Disregard" the Hand-written Amended-Complaint that was inadvertantly mailed and improperly completed.

Respectfully submitted,

RONALD D. GRANGER B-24617 (Plaintiff)

Stateville Correctional Center

P.O. Box 112

Joliet, Illinois 60434-0112

PROOF OF SERVICE BY U.S. MAIL

The undersigned Plaintiff certifies that on July 10th, 2008 the paintiff served on (ALL) Party's and their Attorney's of Record a true and correct copy of these pleadings by placing the same in the U.S. Mail at Stateville Correctional Center, P.O. Box 112, Joliet, Illinois Postage Prepaid and Appropriately addressed.

RONALD D. GRANGER B-24617

Stateville Correctional Center

P.O. Box 112

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